



Department
of
Education

SFA Records Control Schedule

November 15, 2001

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**ATTACHMENT A—DRAFT OF REVISED DEPARTMENT OF EDUCATION
STANDARD FORM 115, REQUEST FOR DISPOSITION AUTHORITY.....1**

**ATTACHMENT B—COPY OF APPROVED U. S. DEPARTMENT OF EDUCATION
SF115, SIGNED BY THE ARCHIVIST OF THE UNITED STATES, MARCH 29, 20001**

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ABOUT IMAGED RECORDS” UPDATED APRIL 23, 20011**

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1. Introduction

1.1 Purpose

The purpose of this draft *Request for Disposition Authority*, National Archives and Records Administration (NARA) Standard Form (SF) 115 is to amend dispositions for Student Financial Assistance (SFA) records covered by an existing U.S. Department of Education (hereafter called the Department) SF 115 approved by the Archivist of the United States, March 29, 2000. The changes to the dispositions are necessary to extend retention periods for records of the Case Management and Oversight Division, and to accommodate the implementation of SFA's Electronic Records Management System (ERMS) during its pilot phase.

1.2 Project Description

The SFA ERMS project is designed to improve the efficiency of the SFA operations by use of an enterprise-wide records management solution. Records will be entered by system users or captured via a scanning process, placed in a searchable records management system, made accessible to those who have the appropriate security authority, and safeguarded according to SFA policy. Implementation of the solution developed will modernize the process of generating, managing, using, storing, securing, and disposing of hard copy and electronic records.

The SFA is one of the program offices within the Department. In 1998, the Reauthorization of the Higher Education Programs established the SFA as the Government's first performance-based organization (PBO) to administer the SFA Assistance programs at the Department. As the responsible body for managing the delivery of Federal student financial aid, the SFA mission is to help put America through school. They administer several major student aid programs including Pell Grants and Stafford Loans. The financial aid programs provide approximately \$54 billion of financial aid each year to college students.

1.3 Document Organization

The following sections are included in this document:

- **Section 1—Introduction** provides an overview of the project to revise SFA Records Control Schedules (RCS) including the purpose and organization of the document, a brief description of the project, key sources of information, and acronyms used in the document.
- **Section 2—Background** provides general background information about NARA's Request for Disposition Authority (SF 115) process and SFA's project in particular.
- **Attachment A**—Draft of SF 115 Form. The changes reflect the new dispositions that map to the current business practices of the Case Management and Oversight Division, Document Receipt and Control Center (DRCC). The draft also contains media neutral disposition instructions necessary for the implementation of SFA's ERMS

- **Attachment B**-copy of an approved U.S. Department of Education SF-115, signed by the Archivist of the United States, March 29, 2000 which currently covers the disposition for SFA's Case Management and Oversight Division including the records of the DRCC.
- **Attachment C**- copy of NARA's "Frequently Asked Questions About Imaged Records" update April 23, 2001.

1.4 Points of Contact

The points of contact for this project are listed in Figure 1-1, Points of Contact.

Figure 1-1: Points of Contact

Organization	Name	Role	Phone No.
Department of Education	Chiquitta Thomas	Records Manager	202-708-9265
SFA	Jim Lynch	Chief Financial Officer (CFO); Project Sponsor	202-708-4664
	Cheryl Queen	Chief Information Officer (CIO); Integrated Project Team (IPT) Project Manager (IPT Lead)	202-708-9458
	James Barnard	CFO; Director of Administration	202-260-0202
	Greg Woods	Chief Operating Officer (COO)	202-205-2289
	To Be Determined (TBD)	SFA Records Manager	
Mod Partner (EDS)	Umang Thapar	Electronic Document Management (EDM) Services Technical Delivery Project Manager	202-414-4954
	Tim O'Connell	EDM Services Task Leader	202-414-8492
	John Hackett	EDM Services Certified Records Manager (CRM)	202-414-8341

1.5 Project References

The following information sources were used in the development of this document:

- Electronic Records Management Proposal Task Order #25 (Modification 01), April 20, 2001

- Requirements Specifications for the Student Financial Assistance Electronic Records Management System, March 30, 2001
- Student Financial Assistance Headquarters Records Management Handbook, January 16, 2001
- National Archives and Records Administration, *Disposition of Federal Records, A Records Management Handbook*, Revised Edition
- U.S. Department of Education, *Records Disposition Schedules* (Revised December 1998)

1.6 Acronyms

The following acronyms are used in this document:

AAAD	Administrative Actions and Appeals Division
CFO	Chief Financial Officer
CIO	Chief Information Officer
COO	Chief Operating Officer
DM	Default Management
DMA	Data Management and Analysis
DOD	Department of Defense
DRCC	Document Record Control Center
EDM	Electronic Document Management
ERMS	Electronic Records Management System
GRS	General Records Schedule
HEA	Higher Education Act
HQ	Headquarters
IPT	Integrated Project Team
NARA	National Archives and Records Administration
OIG	Office of Inspector General
PEPS	Post secondary Education Participants System (PEPS)
PPA	Program Participation Agreements
RCS	Record Control Schedule
SF 115	Standard Form 115

SFA	Student Financial Assistance
TBD	To Be Determined
WNRC	Washington National Records Center

2. Background

This section provides general background on NARA's records disposition process and specifically about SFA's records disposition.

2.1 The Standard Form 115 (SF 115)

The SF 115 form is used to request a change in the disposition of a series of records. The disposition of records is the third and final stage of the lifecycle of records; the other stages are creation, and maintenance and use. Disposition can be defined as the actions taken regarding records no longer needed in current office space. These actions include transfer to storage; transfer of records from the department to another agency; transfer of permanent records to NARA; and the disposal of temporary records.

2.2 What records will the revised SF-115 cover?

This revised SF 115 will cover records of the Case Management and Oversight Division, which includes AAAD, DMA, DM and other components. Under the SFA File Plan, the records of the DRCC (part of DMA) are mapped to the Eligibility and Oversight sections. The DRCC is the first section of SFA that will receive the ERMS. Since the Case Management and Oversight Division's records were covered by a recent disposition authority, it was decided by SFA that it would be unnecessary to create a new records control schedule for the DRCC but simply revise the current one. Mod Partner is revising the current SF 115 (Attachment A) to create media neutral dispositions; to extend the retention periods as requested by the Department of Education General Counsel; and to include references to loan default files maintained by DM.

2.3 SFA's desire to revise current records retention periods?

SFA has needed to extend the retention periods for records to better reflect the business practices that are in place today. In addition to implementing an ERMS, SFA wants to change the way some of its business records are disposed of. After the implementation of the ERMS, the record copy of many of SFA's record will be in an electronic environment; the records will be stored on ERMS servers and no longer in paper format in records storage centers. During the initial implementation phase, the ERMS will contain the scanned paper records of the DRCC. Once the system is in production, all electronic documents from external and internal sources generated and received by the DRCC will be stored in the ERMS.

2.4 NARA's policy for scheduling Electronic Records Management Systems.

Since few ERMS are currently implemented in the Federal government, NARA has not had the opportunity to evaluate many systems; few if any policy and procedures have been produced regarding these systems. NARA has adopted the Department of Defense (DOD) *Design Criteria Standard for Electronic Records Management Software Applications* (Revision 1)(DOD 5015.2)

and its certification process. The acceptance of these standards will ensure that all software used for the ERMS meets all of NARA's records management and archival guidelines.

Mod Partner staff has been informed by the NARA that they will evaluate the system only after its pilot phase is complete. In addition, Mod Partner has determined two acceptable methods for requesting disposition authority using a certified ERMS. The first method is scheduling the system itself, that is list all the records in the system with the appropriate disposition. This method works best when all of the records in the system have the same disposition. The other method is to create a "media neutral" records control schedule, thereby eliminating all references to paper records and their physical storage and dispositions. The result is a schedule that may be used for both paper and electronic records.

**ATTACHMENT A—DRAFT OF REVISED DEPARTMENT OF
EDUCATION STANDARD FORM 115, REQUEST FOR
DISPOSITION AUTHORITY**

Attachment A – PDF insert here

U.S. Department of Education (Department)
Case Management and Oversight (formerly Institutional Participation and Oversight Service)
Office of Student Financial Assistance

The following schedule is for records created by the Department which document the process by which an institution is approved to participate in the Student Financial Assistance (SFA) programs authorized by Title IV of the Higher Education Act (HEA) of 1965, as amended. The records also document oversight of an institution's compliance with the regulations governing Title IV Programs. The records include documentation provided by the financial aid community (institutions, accreditation and state licensing agencies, guaranty agencies and lenders, and auditors) pertaining to an institution's participation in the Title IV Programs. This schedule applies to records maintained by the Department (Case Management and Oversight, formerly known as the Institutional Participation and Oversight) in headquarters, the regions, and at the Washington National Record Center (WNRC).

Included are the following:

1. *Application for Approval to Participate in Federal Student Financial Aid Programs* required from institutions submitting applications for initial participation, recertification, changes in ownership or restructure, reinstatement, and other changes in its relation to the Department's Student Financial Aid Programs. Beginning July 1, 1998, institutions were encouraged to submit their applications electronically. The Department, however, will continue to accept paper applications until further notice.
2. Financial Statements that report the financial condition of institutions participating in the Title IV programs. The reports include audit opinions, balance sheet, income statement, statement of cash flows, and correspondence with financial institutions.
3. Audit Reports, which detail the Title IV programs audits of participating postsecondary institutions. The reports provide the audited period, management assertions, the auditor information sheet, schedule of findings, questioned costs, summary schedules A, B, and C, and corrective action plan.
4. Program Review Reports that monitor, document, and determine a participation postsecondary institution's compliance with the Title IV SFA programs. The program review reports drafted by the department emphasize the scope of the review, findings of non-compliance, regulatory authority, and corrective action.
5. School Loan Default Reports, which detail the school default rates during participation in the Title IV SFA programs.

Description of Records

1. *Eligibility Files*

- a. Applications completed by educational institutions and submitted to the Department in order to certify for participation in the Title IV SFA Programs, and Program Participation Agreements (PPAs) made between the Department and certified educational institutions.

Disposition: **TEMPORARY**. Cutoff files one year after the institution's next re-certification into the program. Destroy 30 years after cutoff.

- b. Correspondence, memorandum, and other documents relevant to applications, and PPAs.

Disposition: **TEMPORARY**. Cutoff files one year after the institution's re-certification into the program. Destroy 30 years after cutoff, or when no longer needed by the Department for reference purposes.

- c. Electronic copies of applications received through the Postsecondary Education Participants System (PEPS) via the Internet.

Disposition: **TEMPORARY**. A paper copy of the application is printed out and placed in the appropriate school file, (see item 1a). The PEPS System will be schedule at a later date.

- d. Reference copies of electronic records (to include electronic versions of records created by electronic mail or word processing applications).

Disposition: **TEMPORARY**. Delete copy when no longer needed for reference or updating

2. *Financial Statement Files*

- a. Includes financial statements submitted annually by participating Title IV institutions, balance sheets, cash flow information, information concerning income/retained earnings, and other related correspondence. These records are compiled in support of applications completed to certify or recertify an organization as eligible to participate in Title IV SFA programs.

Disposition: **TEMPORARY**. Cutoff files two years after the end of the fiscal year in which the review is completed. Destroy 30 years after cutoff.

- b. Reference copies of electronic records (to include electronic versions of records created by electronic mail or word processing applications).

Disposition: **TEMPORARY**. Delete reference copy when no longer needed for reference or updating.

3. Audit Reports

- a. Includes compliance audit reports, audit clearance documents, schedule of findings, summary schedules, and other correspondence submitted by participating Title IV institutions in support of applications completed to certify or re-certify an organization as eligible to participate in Title IV SFA Programs.

Disposition: **TEMPORARY**. Cutoff files two years after the end of the fiscal year in which the review is completed. Destroy 30 years after cutoff.

4. Program Review Files

- a. Includes program review reports, which monitor, document, and determine whether participating post-secondary institutions comply with Title IV SFA financial and other program requirements, with other related correspondence.

Disposition: **TEMPORARY**. Cutoff files one year after the institution terminates from the Title IV SFA programs. Destroy 30 years after cutoff.

- b. Reference copies of electronic records (to include electronic versions of records created by electronic mail or word processing applications).

Disposition: **TEMPORARY**. Delete reference copy when no longer needed for reference or updating.

5. School Loan Default Files

- a. Includes cohort default rate appeal/challenge letters, and loan record detail reports for determination of whether participating post-secondary institutions comply with Title IV SFA Financial or other requirements.

Disposition: **TEMPORARY**. Cutoff files one year after the fiscal year the review was completed. Destroy five years after cutoff.

- b. Correspondence, memoranda, mail receipts, and other documents relating to school cohort default rates.

Disposition: **TEMPORARY**. Cutoff files one year after the fiscal year the review was completed. Destroy five years after cutoff.

- c. Reference copies of electronic records (to include electronic versions of records created by electronic mail or word processing applications).

Disposition: **TEMPORARY**. Delete reference copy when no longer needed for reference or updating.

**ATTACHMENT B—COPY OF APPROVED U. S. DEPARTMENT OF
EDUCATION SF115, SIGNED BY THE ARCHIVIST OF THE
UNITED STATES, MARCH 29, 2000**

Attachment B – PDF insert here

**ATTACHMENT C—COPY OF NARA’S “FREQUENTLY ASKED
QUESTIONS ABOUT IMAGED RECORDS”
UPDATED APRIL 23, 2001**

Frequently Asked Questions About Imaged Records

Updated 4/23/01

- What is imaging?
- What factors must be considered in determining whether to image records?
- What are possible advantages and disadvantages of maintaining records as images?
- What are some of the cost factors that should be considered before starting an imaging project?
- What are the recordkeeping requirements for imaged records?
- When do records converted to images need to be scheduled?
- Do indexes created for imaged records need to be scheduled?
- Under what conditions will NARA approve transfer of permanent records in imaged formats?

This FAQ provides a high level overview and general outline of imaging issues relating to management of Federal government records. Since this is an evolving area, additional answers will be posted as they are developed. Before actually choosing an imaging project/system, a detailed review of the issues and the literature would be required, as well as an analysis of specific business needs.

Also, please review Frequently Asked Questions about Optical Media for additional information. Please bookmark these pages and check back for additional guidance.

What is imaging?

Imaging is a process by which a document (primarily on paper, although any medium can be used) is converted from a human-readable format to a computer-readable digital image file. A digital image consists of pixels (picture elements or tonal values in binary code) arranged in columns or rows. The number of pixels per inch determines the image's resolution (clarity and definition of the image expressed as height by width in pixels for image files or as dots per square inch (dpi) for prints).

These imaged pictures of documents can be stored on a variety of media. The most common types of storage are magnetic media (such as tapes, disks, and magnetic cartridges) or optical media (such as CD-ROM and other removable disks known as "platters"). When combined with effective indexing, imaging the files can shorten information retrieval time and allow access to materials for multiple users at various locations.

Image files come in many different types of software-dependant formats, such as .gif, .jpg, and .tif. Most formats are proprietary, so computers need software to convert the images back to a human-readable format. Proprietary file formats may not be supported long term by manufacturers and may vary from vendor to vendor. Many file formats use compression to force more data into less storage space and speed image precision, storage, and transmission. Compression may be *lossless* (less compression but no data loss) or *lossy* (deep compression with subsequent data loss). Lossy file formats, such as JPEG (.jpg) files, don't necessarily look the same after compression.

Without special software, computers generally cannot use the informational content of a raw image file to search for or retrieve a specific image. Search and retrieval normally depends on some form of indexing, which assigns specific metadata to each document, such as author, recipient, date, title, and content keywords. This index, or metadata, can be simple or sophisticated, and is typically an electronic database that is linked to the images. Useful indexing requires careful planning and forethought before any actual imaging begins. Images of textual records can be converted to searchable electronic text using optical character recognition (OCR) technology. OCR is accomplished by a software application that reads the images and produces text based on recognized patterns in those images. Then, the electronic text can be stored in computer-readable form for search and retrieval purposes. OCR doesn't work for all kinds of documents, particularly for handwritten, poor contrast, unusual type font, or mixed text/image documents. Even when using good quality originals, there will be costs for post-scanning clean up of raw OCR text.

What factors must be considered in determining whether to image records?

The decision to adopt a document imaging system should be based on business needs. Agencies must justify the implementation of a system based on an analysis of their work processes and business needs balanced against costs. The decision to implement an imaging system should be based on improvements in productivity and efficiency or quality of service. Simply automating an existing process may not lead to significant savings or improved performance. Costs include more than just the initial purchase of an imaging system. You may also incur migration costs if the information has to be retained for periods longer than five to ten years.

Before starting any imaging project, know the project's mission, users, priorities (speed, image quality, and quantity), and functional goals (reference, web use, publication, other). Additionally, assess staff expertise and availability (to do scanning, manage infrastructure, migrate data, and build metadata), and address content issues, such as physical condition, format, nature and attributes to be captured.

There are advantages to instituting imaging systems, such as increased storage capacity, elimination of "out-of-file" problems, shortened retrieval times, improved retrieval by multiple users, and ease of information dissemination.

There are also disadvantages, such as expensive hardware and resource-intensive indexing requirements, as well as rapid technological changes that require frequent upgrades of hardware and software. Migration and conversion of records in imaged format may also be needed to protect the information in records not yet eligible for disposal.

In addition to the cost factors, other factors that should be considered when determining whether to image documents include:

- **Volume of records.** Imaging is generally used for large volumes of records.
- **Reference use.** Imaging is most effective on highly referenced collections where a short retrieval time is important or where there are multiple users accessing the same records. Combined with effective indexing, imaging records can facilitate retrieval.
- **Relationship to records on other media.** Consider whether the records to be imaged have to be used with records on other media.
- **Records and information usage.** Consider how the information is used and how long the record is needed. Required retention periods are specified in records schedules.
- **Legal acceptability.** Following established procedures and maintaining the documentation of audit trails and other business practices will ensure that information is kept that may be needed to document record authenticity and reliability.
- **Ease of maintenance.** Balance storage costs and capacity with indexing, conversion, quality control, and migration costs.
- **Staffing requirements.** Increased imaging and indexing of records and quality control procedures may require additional staff training.
- **Work process and information flow.** Would imaging facilitate the work process? Considerations include how records are routed, how information is added to records or files, and when records (finals or drafts) need to be captured.
- **Verification of signatures.** If signature verification is a requirement, consider that forensic analysis of signatures is not possible with imaged records.
- **Document preparation.** Determine how much work needs to be done to make the files ready for imaging. Document preparation for voluminous files may be significant.
- **Quality control issues.** QC procedures must be instituted both while preparing documents for imaging and while verifying and validating imaged information.
- **Condition of original records.** The condition of the records will affect their handling during imaging as well as the quality of the imaged record that can be produced. This will particularly be a factor for records that are:
 - damaged
 - faded
 - oversized

- **In-house operation versus contracting operations with a service bureau.**
- **Image requirements** (resolution, compression, headers, etc.) will vary depending on how images will be used.
- **Indexing requirements** and metadata fields are determined by analyzing how users will access images.
- **Requirement to convert permanent records to an acceptable format** prior to transfer to the National Archives of the United States. [Also see Question #8.]

Several states, including Kansas, Minnesota, and Missouri have developed good products that provide additional information on digital imaging systems and issues.

- Electronic Recordkeeping Resources, Kansas State Historical Society, <http://hs4.kshs.org/archives/ermlinks/doc.htm>
- Minnesota Historical Society, Digital Imaging FAQs <http://www.mnhs.org/preserve/records/digitalimagingfaq.html>
- Missouri Secretary of State's Office, Records Management and Archives Division, Draft Digital Imaging Guidelines, April 2000 <http://mosl.sos.state.mo.us/rec-man/resource.html>

What are possible advantages and disadvantages of maintaining records as images?

Advantages include:

- **Ability to use very high-density storage media.**
- **Shorter retrieval time than hard copy when the images are well indexed.**
- **Multiple users and access levels are possible.**
- **Low shipping costs and ease of information dissemination.**
- **Ease of use of imaged copies of records in vital records and disaster recovery plans.**
- **Legal uses.** Organizations that need to retrieve information efficiently during discovery and litigation may find that using imaged records can assist in the effort.
- **Ease of making copies of the imaged records.**
- **Digital images don't lose quality from generation to generation.** Well made copies and derivatives can be as good as the original images.

Disadvantages include:

- **Digital images are not human-readable without computer equipment.**
- **Significant equipment costs, including hardware and software.**

- **Potential for hardware and software obsolescence.** Generally, systems change every 18 months to 5 years, software changes every 2-3 years, and the life expectancy of media is relatively short.
- **Indexing requirements may be more extensive than is required with other formats.** Unless records are arranged in a logical sequence or clearly indexed, it may be difficult to identify a series or use groups of records as a series.
- **Different types of scanners** must be used to scan text, oversize items, photographic prints, slides, and other formats.
- **Digital quality control, metadata capture and management, and image capture and management are complex and time consuming processes** requiring expertise and constant vigilance.
- **Complex disposition and potential problems in implementing dispositions.**
 - If records are stored without regard to retention periods on an individual disk or in an individual directory, each record must be selected for destruction or to move to off-line storage.
 - When agencies use write-once-read-many (WORM) optical media, records should be grouped by like retention periods on individual disks or in individual directories.

What are some of the cost factors that should be considered before starting an imaging project?

A cost benefit analysis should be completed before choosing to implement any imaging system. Your organization may already have a standard method of conducting cost-benefit analysis, for example, as part of your Information Technology systems development lifecycle methodology or as part of your standard procedures for purchases and acquisitions.

For more information, review the Fast Track product, *Analysis of Costs and Benefits for ERM/ERK Projects* at <http://www.nara.gov/records/fasttrak/prod8.html>. You may also find it helpful to review the cost-benefit analysis methods and guidelines used by various Federal agencies that are cited below.

- **Office of Management and Budget.** *OMB Circular No. A-94* provides general guidance for conducting cost-benefit analysis for all types of projects.
- **General Accounting Office.** The GAO *Information Technology Investment Evaluation Guide* describes the analysis of benefits, costs and risks in the context of an overall IT investment management process.

- **National Institutes of Health.** The *Cost Benefit Analysis Guide for NIH IT Projects* is a comprehensive guide for performing cost-benefit analysis. The NIH IT Cost-Benefit Analysis web page provides access to examples of cost-benefit analysis.
 - **U.S. Patent and Trademark Office.** *The USPTO Economic Analysis* (Technical Guideline IT-212.3-10) provides the framework and requirements for completing a business case and economic analysis of IT investments, including analysis of benefits and costs and evaluation of alternatives.
-

What are the recordkeeping requirements for imaged records?

"Recordkeeping requirements" are statements in statutes, regulations, and agency directives that provide general and specific requirements for Federal agency personnel on particular records to be created and maintained in the file (36 CFR Part 1220.14). NARA has not yet developed requirements for images; however, NARA requirements for electronic systems can be found in 36 CFR Part 1234. Each agency must develop their own recordkeeping requirements for imaging systems based on their specific business needs for the system, agency IT architecture, and overall agency mission. Each agency should review their particular records, take note of specific agency uses of the records, and determine which records are needed to document their activities. Then, each agency must develop a plan to protect the information in those records for the entire retention period. When imaging records, document the procedures and provide audit trails to serve as the record that the images were created properly and validated, similar to the steps required by 36 CFR 1230.12(a) - (c). A migration plan may also be needed to ensure that the information in the images can be accessed throughout the entire retention period of the records. NARA must approve retention periods. For additional information on recordkeeping requirements, consult *Agency Recordkeeping Requirements: A Management Guide*, on the NARA web site at <http://www.nara.gov/records/pubs/adequacy.html>. Since this is a rapidly evolving area, agencies should consult with their appraisal archivist to determine whether NARA knows of any pilot projects or best practices that might apply to their imaging implementation.

When do records converted to images need to be scheduled?

Temporary Records

Imaged copies of records already scheduled as temporary do not need to be scheduled if the nature and content of the records remain identical to the description in the schedule.

- Apply the disposition authority approved by NARA for the paper records to the image files.
 - Retain the paper copies of temporary records that have been imaged only when there is a compelling business reason.
-

- Retention of the paper copies after imaged copies have been verified adds costs by requiring
 - Organization of the files
 - Periodic file cutoffs
 - Retirement to a records storage facility or disposal.

Retention schedule items for temporary textual records must be added or revised whenever the nature or content of records changes.

- Reengineered work processes or other changes may result in creation of a different series of records.
- When the nature or content of a records series changes, both the paper and imaged copies of the records must be scheduled, even if all of the records are temporary.

Unscheduled Records

When unscheduled records are imaged, the image file and the paper records must both be scheduled and the paper copies may not be disposed of until an approved schedule for covering the records is approved. The schedule should provide for the disposition of both the paper and imaged copies and specify which version is the recordkeeping copy.

Permanent Records

When paper records that are scheduled as permanent are imaged, the imaged files must also be scheduled. The agency may not dispose of the paper copies until NARA has approved a new schedule for them. The schedule should provide the disposition of both the paper and imaged copies and specify which version is the recordkeeping copy.

Do indexes created for imaged records need to be scheduled?

- Indexes and other finding aids for temporary records are disposable under General Records Schedule 23, item 9, unless the finding aid contains an abstract or other information that can be used independently of the related records.
 - Indexes and finding aids for permanent records that have been imaged must be scheduled.
 - Indexes and finding aids for unscheduled records that have been imaged must be scheduled along with both the paper and imaged copies of the records.
-

Under what conditions will NARA approve transfer of permanent records in imaged formats?

NARA does not have transfer standards for imaged records at this time. We will evaluate schedules that include permanent imaged records on a case by case basis.